

EXHIBIT C

(CONDITIONALLY FILED REDACTED)

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ATTORNEYS FOR ALL PLAINTIFFS

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

JANE ROE, an individual; MARY ROE,
an individual; SUSAN ROE, an
individual; JOHN ROE, an individual;
BARBARA ROE, an individual;
PHOENIX HOTEL SF, LLC, a
California limited liability company;
FUNKY FUN, LLC, a California limited
liability company; and 2930 EL
CAMINO, LLC, a California limited
liability company,

Plaintiffs,

v.

CITY AND COUNTY OF SAN
FRANCISCO, a California public entity,

Defendants.

Case No. 4:24-cv-01562-AMO

**DECLARATION OF SUSAN ROE (A
PSEUDONYM)**

**DECLARATION WITH TRUE NAME
OF DECLARANT TO BE FILED
UNDER SEAL**

**DECLARATION WITH TRUE NAME
OF DECLARANT REDACTED TO
BE PUBLICLY FILED**

Action Filed: 03/14/2024
Trial Date: Unassigned

1 I, [REDACTED], declare as follows:

2 1. I am a resident of the Tenderloin neighborhood in San Francisco and a
3 plaintiff in the above captioned matter. I have personal knowledge of the facts set
4 forth herein. If called as a witness, I could and would competently testify to the
5 matters stated herein.

6 2. I live alone in a residence on Eddy Street, between Jones and
7 Leavenworth, in the Tenderloin. I am elderly. I am disabled. I depend on a walker to
8 ambulate.

9 3. The sidewalks and public spaces in my neighborhood are impassable
10 and inaccessible to me. Encampments and bulky items, such as duffle bags, shopping
11 carts and disassembled bicycles, obstruct the sidewalks.

12 4. Large crowds also block the sidewalks around my residence. People in
13 these crowds openly smoke and inject drugs, scream and act erratically. There are
14 frequently groups on street corners near my home selling or buying drugs. They
15 frighten me and make me feel unsafe.

16 5. I attend community events and receive services at a senior center on
17 Turk Street. These events and services are important to me. However, I dread going
18 to the center because intimidating crowds involved in drug dealing always block a
19 corner where I must cross the street. I must also be on the lookout for and navigate
20 around excrement, used syringes, vomit and garbage on the sidewalk. These
21 obstacles make it impossible me her to use the sidewalk. Instead, I walk in the busy
22 street, which is dangerous.

23 6. I filed this lawsuit because I want to create change for my neighborhood.
24 I understand that this lawsuit does not seek to recover money damages. I am
25 involved in this lawsuit because I was the City to immediately address the deplorable
26 conditions around my home and throughout my neighborhood. I want clean, safe and
27 accessible sidewalks and public spaces. I want the City to treat me and my
28 neighborhood that same way as it treats the nice neighborhoods in the City.

6 I declare under penalty of perjury under the laws of the State of California
7 that the foregoing is true and correct to the best of my knowledge.

8 Executed on this 21st day of March, 2024, at San Francisco, California.

9 [REDACTED]
10 [REDACTED]